



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS/DMP:NJM
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 7, 2018

By Email and ECF

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Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter. This discovery consists of materials governed by the Court's March 21, 2017 Protective Order (the "March Protective Order").

Enclosed is an encrypted CD containing materials related to the victims of the defendant, bearing Bates numbers DZ067156-DZ067412. Consistent with the Court's September 5, 2018 Order, the enclosed disc contains certain materials designated "ATTORNEYS' EYES ONLY." (DZ067156-DZ067285). These materials are governed by paragraph 4 of the government's proposed protective order, ECF No. 115-2.

The enclosed CD also contains materials designated REDACTED VICTIM MATERIALS. (DZ067286-DZ067412). Consistent with the Court's September 5, 2018 Order, these materials are "for Defendant to review ONLY in the presence of defense counsel," and are not intended for dissemination to the defendant.

If you have any questions or requests regarding further discovery, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

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Enclosures (DZ067156-DZ067412)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)